

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

KAREN SUMMERSET and SARA
TAYLOR, individually and on behalf of all
others similarly situated,

Plaintiffs,

Civil Action No. 1:25-cv-11121-PBS

vs.

LIBERTY MUTUAL INSURANCE
COMPANY,

Defendant.

**LIBERTY MUTUAL INSURANCE COMPANY’S MOTION
TO DISMISS PLAINTIFF SARA TAYLOR’S CLAIMS AND TO STRIKE CLASS**

Defendant Liberty Mutual Insurance Company (“Liberty Mutual”) hereby moves to dismiss Plaintiff Sara Taylor’s claims against it as asserted in Plaintiffs Karen Summerset and Sara Taylor’s First Amended Class Action Complaint (“Complaint”), ECF No. 34, for lack of standing under Federal Rule of Civil Procedure 12(b)(1) and failure to state a claim under Federal Rule 12(b)(6), and to strike Plaintiffs’ class allegations under Federal Rules 12(f) and 23 as an impermissible fail-safe class. In support of its Motion, Liberty Mutual relies upon its Memorandum of Law submitted herewith.

[Signature on the following page]

Respectfully Submitted,

Liberty Mutual Insurance Company,
By its attorney,

/s/ Kevin P. Polansky

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Dated: December 10, 2025

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, I certify that I have conferred with counsel for Plaintiffs regarding the foregoing Motion in a good faith attempt to resolve or narrow the issues.

Dated: December 10, 2025

/s/ Kevin P. Polansky

Kevin P. Polansky

CERTIFICATE OF SERVICE

I, Kevin P. Polansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: December 10, 2025

/s/ Kevin P. Polansky

Kevin P. Polansky